

FTC, Office of Secretary, Room H-135 (Annex W)
600 Pennsylvania Ave NW
Washington, DC 20580

Re: Business Opportunity Rule R511993

To All Parties of Influence,

This letter is in response to the proposed Business Opportunity Rule R511993. I feel that this piece of legislation, if passed, in its current state would prohibit the viability of the business I currently operate from my home as a XanGo™ Independent Distributor. Though I am writing to you on behalf of myself and family, I know the impact of this ruling will be wide spread and affect thousands in the same position.

About 3 years ago I was introduced to a product through XanGo™ LLC that changed my son's life. Jerry, my 5 year old son was born with Eczema from his waste down, and after 3 years of trying every available remedy, XanGo™ helped to do what no other had come close to. To date, by consistently taking this product he has normal skin. If you have ever known anyone who has dealt with Eczema, you know what a blessing this has been to my son and to me as a father. Well, when I saw the power of this product, I began to share it with everyone who would listen. Although my background is in the Real Estate Industry, this sharing resulted in a home based business that ultimately led to me leaving the industry that was my livelihood. What I've built with XanGo™ LLC since is a business that affords me the freedom to work from home while spending more time than I ever thought possible with my wife and children. In addition, I've helped countless others to do the same in terms of helping others with their health and finances. Many of these people, like myself, depend solely on the income they now receive from their XanGo™ LLC businesses. Please help preserve the way of life for myself and so many other small business men and women who are in the same position.

What is specially bothersome are the sections in the proposed rule (Rule 511993) that would make it hard or almost impossible for me to sell the XanGo™ product and would seriously impede, if not eliminate, the possibility to introduce the opportunity to others. These new rules have the potential to devastate the growth and profit potential of the business we operate.

One of these, aforementioned, sections proposes a waiting period. What message does this send to the many that could benefit from what I have to share? To me, it echoes an unnecessary caution that I, my product or business is, in some way, flawed. I can tell you after 3 years with this company, this is not the case. Let me ask you this: When a company offers a 100%, 30-day money back guarantee what purpose does a 7 day waiting period serve? Our company has already taken steps to ensure the protection of anyone interested in trying the product. What this rule *would* accomplish is increase the difficulty to build and reduce the opportunity to realize profitability in the early life stages of new businesses. I am aware the spirit of this proposal may be to genuinely help, however, the letter that it is currently written in actually hurts.

To paint an even more vivid picture, let me elaborate on the current cost to start a XanGo™ business. \$35! That is the cost for someone to strike out on their own. I've bought pieces of clothing that cost more than that and never had to wait more than the time it took me to walk to the register. Furthermore, in the instances where I was making such a purchase and they didn't have my size, or the color I was looking for, I simply went elsewhere to give my business. This is precisely the affect I see this ruling having. It will turn business away and ultimately protect those who engage in unethical practices by putting those of us who operate legitimate business out of business. Currently, I work very closely with dozens of people who are not very business savvy, but want more than the 9 to 5 can provide. It is hard enough for them, as it was for me, at the beginning to get their business venture off the ground. More paperwork and a waiting period are not going to make this any

easier and could be the determining deterrent for most. The vision of our company and its founders has been to help the average person improve all aspects of their life. I emphasize *average* and know increasing the complexity of what we have will ruin this for many.

An addition concern I have regarding the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. There is no way I would allow my personal information to be freely distributed in order to purchase a product of *any* kind! Think about what this is asking. If you knew, before making a purchase or venturing into business for yourself, that your information would be freely released to other unknown parties would you go any farther? References, for me, or any others in my company are not an issue. Actually, I routinely give them and many share experiences about the product or business without restraint. The fundamental difference between the way I disclose this information and the way it would be required is I have been given permission beforehand.

Several other issues arise when personal information is released like this. Here in Arizona, identity theft is more prevalent than almost anywhere in the country and I take measure to protect mine. I'm supposed to be content with it being given out to people who I've never met and when I'm not even aware it's happening? You also have then the possibility that women would be targeted and or harassed, that sexual and/or racial attacks could ensue, or that those I am prospecting for a business opportunity are readily accessible to competitive, more aggressive, and questionable recruiters. Under this new rule, they would quite literally be given the contact list for my entire organization with just a couple of phone calls. The customers I have established relationships with are now my only source of income and, as in any business regardless of industry, rightfully protected. I think you will agree this just doesn't make much sense and needs to be revisited.

I know this rule was drafted with the best intentions in mind to protect those of us who may fall prey to others who operate unethically within our industry. I see these practices personally by those who approach me because of my success. However, the proposed rule R511993 will do nothing to stop these people and/or practices yet negatively impact the honest. This will hurt if not ruin my business. Those whom this rule targets have never bothered to follow regulation anyway, so what I see here is a shotgun being used when a rifle is needed. Let's go after the problems with a well thought out plan that targets those problems specifically and not the masses.

The Direct Selling Industry is a Multi Billion Dollar industry and has brought more great products and opportunity to Americans than any other can be accredited with. It is an important part of our economy and has become the provider of my family. I respectfully request that you visit our headquarters in Utah to see, and meet, first hand some of the world class businessmen, founders, and companies you have in this industry.

Thank you, in advance, for your time and attention to my concern. My hope is that some light has been brought onto these issues and that you will help me, and many others, continue a way of life we have come to love. Please freely contact me if I can be of any further assistance in the least.

Passionately,